

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**DECLARATION OF JAMES R. BEDELL IN SUPPORT OF SMARTMATIC'S
OPPOSITION TO DEFENDANTS' MOTION FOR LEAVE TO FILE
MOTION TO COMPEL**

I, James R. Bedell, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am an attorney at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited ("Smartmatic") in the above-captioned lawsuit.

3. Attached as Exhibit A is a true and correct copy of excerpts from the transcript of the deposition of Smartmatic's 30(b)(6) corporate representative, Antonio Mugica.

4. Attached as Exhibit B is a true and correct copy of excerpts from the transcript of the deposition of Smartmatic's 30(b)(6) corporate representative, Roger Alejandro Piñate Martinez.

5. Attached as Exhibit C is a true and correct copy of an email from Julie Loftus to Christopher Kachouroff and Samuel Harms, dated April 17, 2024.

6. Attached as Exhibit D is a true and correct copy of an email from Mr. Kachouroff to Ms. Loftus and Timothy Frey, dated May 3, 2024.

7. Attached as Exhibit E is a true and correct copy of an email from Mr. Kachouroff to Ms. Loftus, dated June 29, 2024.

8. Attached as Exhibit F is a true and correct copy of Defendants' Amended Notice of 30(b)(6) Deposition of Plaintiffs.

9. Attached as Exhibit G is a true and correct copy of an email from Mr. Kachouroff to Ms. Loftus, Mr. Frey, and me, dated July 8, 2024.

10. Attached as Exhibit H is a true and correct copy of an email from Mr. Frey to Mr. Kachouroff, dated July 9, 2024.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



James R. Bedell

Executed on August 16, 2024.